

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

INSPIRED PURSUITS, LLC,
QUALTIM, INC., CENTER FOR
BUILDING INNOVATION, LLC,
DRJ ENGINEERING, LLC, KIRK
GRUNDAHL, and SUZANNE GRUNDAHL,

Plaintiffs,

v.

Case No. 25-CV-75

PARAGON COMPONENT SYSTEMS, LLC,
JOHN HOLLAND, JAMES HOLLAND,
CLEARSPAN COMPONENTS, LLC, ANDREW
EWIN, DAVID REED, SCOTT HOELSMA,
SETH DUNCAN, MICHAEL PITTS, AVERY
RADMACHER, NATHAN BIEREMA, JEREMY
BIEREMA, ROB EASON, and THE ESTATE OF
DANIEL HOLLAND EX REL. SPECIAL
EXECUTOR MARVIN B. SPEED,

Defendants.

**JOINT MOTION FOR EXTENSION
OF RESPONSIVE PLEADING DEADLINE**

Plaintiffs, Inspired Pursuits, LLC, Qualtim, Inc., Center for Building Innovation, LLC, DRJ Engineering, LLC, Kirk Grundahl and Suzanne Grundahl, and Defendants, Paragon Component Systems, LLC, John Holland, James Holland, Clearspan Components, LLC, Andrew Ewin, David Reed, Scott Hoelsma, Seth Duncan, Michael Pitts, Avery Radmacher, Nathan Bierema, Jeremy Bierema, Rob Eason, and the Estate of Daniel Holland ex rel. Special Executor Marvin B. Speed, by their respective attorneys, hereby jointly move

the Court for an order extending the deadline to respond to Plaintiffs' Amended Complaint by two weeks, from May 9, 2025 to **May 23, 2025**.

WHEREFORE, the parties respectfully request that the Court grant this motion and extend Defendants' responsive pleading deadline to May 23, 2025.

Dated this 5th day of May, 2025.

MAY LA ROSA

Counsel for Plaintiffs

s/ May La Rosa

May La Rosa, SBN 1119613
mlarosa@kfinnovations.com
6300 Enterprise Lane
Madison, WI 53719
T: 608-800-7353

LUEDEKA NEELY, P.C.

Counsel for Plaintiffs

s/ Michael J. Bradford *admitted pro hac vice*

Michael J. Bradford
mbradford@luedeka.com
PO Box 1871
Knoxville, TN 37901
T: 865-546-4305

GASS TUREK LLC

Counsel for Defendants Paragon Component Systems, LLC and John Holland

s/ Tamar B. Kelber

Tamar B. Kelber, SBN 1101802
kelber@gassturek.com
Joshua S. Greenberg, SBN 1107959
greenberg@gassturek.com
241 North Broadway, Suite 300
Milwaukee, WI 53202
T: 414-223-3300 F: 414-224-6116

MILLER & MARTIN PLLC

Counsel for Defendants Paragon Component Systems, LLC and John Holland

s/ Stephen E. Kabakoff, admitted pro hac vice

Stephen E. Kabakoff, GA Bar No. 143164

stephen.kabakoff@millermartin.com

1180 W. Peachtree Street, NW, Suite 2100

Atlanta Georgia 30309

T: 404-962-6100

MILLER & MARTIN PLLC

Counsel for Defendants Paragon Component Systems, LLC and John Holland

s/ James T. Williams, admitted pro hac vice

James T. Williams, TN BPR 16341

james.williams@millermartin.com

Eric E. Steelman, TN BPR 38463 *admitted pro hac vice*

eric.steelman@millermartin.com

832 Georgia Avenue, Suite 1200

Chattanooga, TN 37402

T: 423-756-6600

**GEARHISER, PETERS ELLIOTT
& CANNON, PLLC**

Counsel for Defendants Andrew Ewin, David Reed, Scott Hoelsema, Seth Duncan, Michael Pitts, Avery Radmacher, Nathan Bierema, and Jeremy Bierema

s/ Sam D. Elliott, admitted pro hac vice

Sam D. Elliott, TN BPR 009431

sellott@gearhiserpeters.com

320 McCallie Avenue

Chattanooga, Tennessee 37402

T: 423-756-5171 F: 423-266-1605

WRIGHT, CORTESI & GILBREATH

Counsel for Defendants James Holland, Clearspan Components, Inc., and Rob Eason

s/ Stephan R. Wright

Stephan R. Wright, TN BPR 031494

swright@wcglegal.com
2030 Hamilton Place Blvd., Suite 240
Chattanooga, TN 37421
T: 423-286-6919 F: 423-826-6929

GRANT, KONVALINKA & HARRISON, P.C.
Counsel for the Estate of Daniel N. Holland ex rel.
Special Executor Marvin B. Speed

s/J. Scott McDearman
J. Scott McDearman, TN BPR 012714
smcdearman@gkhpc.com
Republic Centre
633 Chestnut Street, Suite 900
Chattanooga TN, 37450
T: 423-756-8400 F: 423-756-6518